



February 15, 2017

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Los Angeles Region
320 West 4th Street, Suite 200
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Subject: Phase 11 Stockpiles Confirmation Sampling Report and Updated Request for
Soil Reuse
Defense Fuel Support Point Norwalk ;15306 Norwalk Boulevard, Norwalk,
California
(SCP NO. 0286A, Site ID NO. 16638)

Dear Mr. Cho:

On December 20, 2016, The Source Group, Inc (SGI) filed the Phase 11 Stockpiles Confirmation Sampling Report (Phase 11 Report) that superseded an earlier submittal of the Phase 11 sampling data. Phase Confirmation Sampling Reports include tabulated data and an evaluation of soil analyses results that are used to classify soil into three categories based on soil cleanup goals: soil not suitable for any re-use and requiring disposal or re-treatment; soil restricted for reuse only as shallow soil, away from groundwater; and soil for unrestricted re-use, including backfilling of deep excavations. The number and frequency of samples for all soil reuse phases follow the June 2015 *Revised Field Sampling and Analysis Plan and Strategy*, and the comparison screening levels are based on the June 15, 2015 *Proposed Addendum to the Soil Cleanup Goals*, approved by RWQCB on July 16, 2015. Also, all soil handling at the site is documented by strict accounting of each stockpile, and each stockpile is individually named, marked in the field by a stake and mapped in field books and updated site maps.

The Phase 11 set of samples included 589 soil samples from 18 stockpiles of treated soil. Upon QA/QC review of the Phase 11 data, SGI identified 7 samples that had initially been mischaracterized, resulting in portions of a soil pile being categorized as restricted instead of unrestricted soil or vice-versa. The enclosed Table 1 proposes an updated soil reuse program for Phase 11 stockpiles. The Table 1-proposed soil reuse ensures that no soil scheduled for restricted use will be used for unrestricted backfilling.

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An attachment (Attachment A) is included to provide detailed documentation of the QA/QC Phase 11 findings.

The 18 Phase 11 treatment stockpiles were dismantled as part of soil handling operations, using the initially assigned soil reuse categorization. Portions of each stockpile were moved to marked, specific stockpiles of treated-restricted (TR) or treated-unrestricted (TU) soil based on the initial soil screening criteria. No soil from these piles has yet been used for backfilling. Attachment A includes a table (Table A-1) listing the seven stockpiles with updated proposed soil reuse, and a Table (Table A-2) that documents the soil handling procedure and tracking followed during the dismantling of each stockpile. Figure A-1 in Attachment A illustrates the location of each stockpile, including piles associated with the Phase 11 stockpile dismantling.

The seven samples that were initially mischaracterized for reuse did not include samples of concern regarding non-reusable soil, and were only related to the restricted vs. unrestricted reuse distinction; no soil containing hydrocarbons above reuse criteria was added to reuse stockpiles. Table A-1 lists each stockpile, the final soil classification/segregation description, as reported in the December 20, 2016 Phase 11 Report, and the initially assigned soil segregation and reuse categorization.

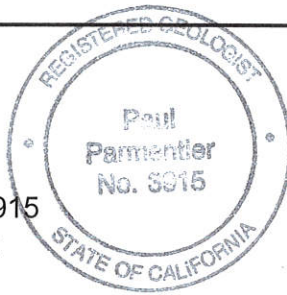
As shown on Table A-1, one sample each from seven stockpiles 80002-D, 80006-O, 80006-R, 80006-S, 80007-A, 80013-I (b) and Powerine-P was initially mis-categorized. One sample each from piles 80006-O and Powerine-P was categorized as suitable only for restricted use, while that soil could have been used for deep unrestricted use, resulting in an insignificant, conservative, error. One sample each from the remaining five stockpiles resulted in one portion from each pile being assigned for unrestricted soil reuse, while it should have been segregated into a pile for restricted soil reuse. Table A-2 lists the soil segregation destination soil piles, and the table indicates that five stockpiles marked for unrestricted use (TU Piles) can be considered to also contain soil that should be restricted to shallow reuse only (stockpiles 80002-D-TU, 80006-R-TU, 80006-S-TU, 80007-A-TU, and 8013-I (b)-TU). Figure A-1 illustrates the location of the five stockpiles that are marked TU, but may contain soil with restricted-use only characteristics. Conservatively, these five unrestricted soil piles are proposed to be considered for restricted soil reuse only, and the updated proposed soil reuse in Table 1 reflects this conservative proposed soil handling.

As part of site data review, SGI also reviewed all the TPH screening tables for Phases 1 to 10, and found no issues of earlier mis-categorization of soil where restricted-rated soil would have been used for deep backfilling or where non-reusable soil was used for any backfilling. In addition, to monitor for VOCs and heterogeneities in the soil, all stockpiles being dismantled were monitored by PID to screen for potentially residual hydrocarbon pockets, and any soil with a conservative PID reading of over 5 ppm was segregated for retreatment.

We have put in place an additional data review step based on database-calculated flagged values and are requiring an additional senior review of proposed segregation to prevent further errors in reporting.



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The Source Group, Inc



Cc:

Ms. Carol Devier-Heeney, DLA

File: DFSP Norwalk – 04-NDLA-007

Attachments:

Table 1: Updated Phase 11 Proposed Reuse of Treated and Clean Soil

Attachment A:

Table A-1: Summary of Phase 11 Soil Reuse Reported Segregation

Table A-2: Phase 11 Treated Soil Handling Summary

Figure A-1: Stockpiles Map, February 1, 2017.

TABLE 1
Updated Phase 11 Proposed Reuse of Treated Soil and Clean Soil
DFSP Norwalk
15306 Norwalk Boulevard, Norwalk, California 90650

Stockpile Number	Stockpile Volume (yds ³)	Confirmation Sampling Status	Unrestricted Soil Reuse (yds ³)	Percent Unrestricted	Shallow Soil Reuse (Restricted) (yds ³)	Percent Restricted	Off-Site Disposal (yds ³)	Percent Off-Site Disposal
Treated Soil								
80002-D*	1,001	35 samples 9/1/2016: 1 section separated requiring off-site disposal or treatment; potential mixing of restricted/unrestricted soil during dismantling of pile, conservatively all reusable soil reserved for restricted use	0*	0%*	971	97%	30	3%
80002-M	978	35 samples 11/1/2016: 2 sections below deep cleanup goals; 33 sections acceptable for shallow soil reuse	59	6%	919	94%	0	0%
80002-N	1,208	35 samples 11/2/2016: 15 sections acceptable for shallow soil reuse; 20 sections separated requiring off-site disposal or treatment	0	0%	519	43%	689	57%
80002-O	972	35 samples 10/12/2016: 21 sections below deep cleanup goals; 8 sections acceptable for shallow soil reuse; 6 sections separated requiring off-site disposal or treatment	583	60%	224	23%	165	17%
80002-P	265	18 samples 10/17/2016: 13 sections below deep cleanup goals; 5 sections acceptable for shallow soil reuse	191	72%	74	28%	0	0%
80006-N	1,265	35 samples 11/2/2016: 34 sections acceptable for shallow soil reuse; 1 section separated requiring off-site disposal or treatment	0	0%	1227	97%	38	3%
80006-O**	845	35 samples 10/13/2016: 1 section below deep cleanup goals; 34 sections acceptable for shallow soil reuse	25	3%	820	97%	0	0%
80006-P	1,156	35 samples 10/12/2016: 33 sections acceptable for shallow soil reuse; 2 sections separated requiring off-site disposal or treatment	0	0%	1087	94%	69	6%
80006-Q	1,162	38 samples 9/1/2016: 22 sections below deep cleanup goals; 13 sections acceptable for shallow soil reuse	732	63%	430	37%	0	0%
80006-R*	1,236	35 samples 8/31/2016: potential mixing of restricted/unrestricted soil during dismantling, conservatively all soil reserved for restricted reuse	0*	0%*	1236	100%	0	0%
80006-S*	1,150	35 samples 8/31/2016: potential mixing of restricted/unrestricted soil during dismantling, conservatively all soil reserved for restricted reuse	0*	0%*	1150	100%	0	0%
80006-T	477	35 samples 10/13/2016: 34 section below deep cleanup goals; 1 section acceptable for shallow soil reuse	463	97%	14	3%	0	0%

TABLE 1
Updated Phase 11 Proposed Reuse of Treated Soil and Clean Soil
DFSP Norwalk
15306 Norwalk Boulevard, Norwalk, California 90650

Stockpile Number	Stockpile Volume (yds ³)	Confirmation Sampling Status	Unrestricted Soil Reuse (yds ³)	Percent Unrestricted	Shallow Soil Reuse (Restricted) (yds ³)	Percent Restricted	Off-Site Disposal (yds ³)	Percent Off-Site Disposal
80007-A*	523	25 samples 7/20/2016: 1 section separated requiring off-site disposal or treatment; potential mixing of restricted/unrestricted soil during dismantling, conservatively all reusable soil reserved for restricted use	0*	0%*	502	96%	21	4%
80013-D	794	35 samples 10/10/2016: All sections below deep cleanup goals	794	100%	0	0%	0	0%
80013-F	983	35 samples 11/3/2016: 34 section below deep cleanup goals; 1 section acceptable for shallow soil reuse	954	97%	29	3%	0	0%
80013-I (a)	340	18 samples 10/17/2016: All sections below deep cleanup goals.	340	100%	0	0%	0	0%
80013-I (b)*	971	35 samples 11/3/2016: 2 sections separated requiring off-site disposal or treatment; potential mixing of restricted/unrestricted soil during dismantling, conservatively all reusable soil reserved for restricted use	0*	0%*	913	94%	58	6%
Powerine-P**	1,162	35 samples 11/1/2016: 4 sections below deep cleanup goals; 23 sections acceptable for shallow soil reuse; 8 sections separated requiring off-site disposal or treatment	128	11%	767	66%	267	23%
Subtotal Volume	16,488	Total 589 samples	4,269	25.9%	10,882	66.0%	1337	8.1%
Clean Soil								
CS-27	900	24 Samples 8/31/2016: 6 sections under deep cleanup goals; 18 section acceptable for shallow soil reuse	225	25%	675	75%	0	0%
CS-28	80	4 Samples 8/31/2016: 3 sections under deep cleanup goals; 1 section acceptable for shallow soil reuse	60	75%	20	25%	0	0%
Subtotal Volume	980	Total 28 samples	285	29%	695	71%	0	0%
TOTAL:	17,468	Total 617 samples	4,554	26.1%	11,577	66.3%	1,337	7.7%

Notes:

yds³ = cubic yards

* Stockpile dismantling resulted in potential mixing of restricted reuse soil with unrestricted reuse soil. Conservatively, all soil is proposed for restricted reuse only.

** Stockpile with potential unrestricted reuse soil mixed with restricted reuse soil. Conservatively, all soil remains proposed for restricted reuse.

TABLE A-1
Summary of Phase 11 Soil Reuse Reported Proposed Segregation
DFSP Norwalk
15306 Norwalk Boulevard, Norwalk, California 90650
January 31, 2017

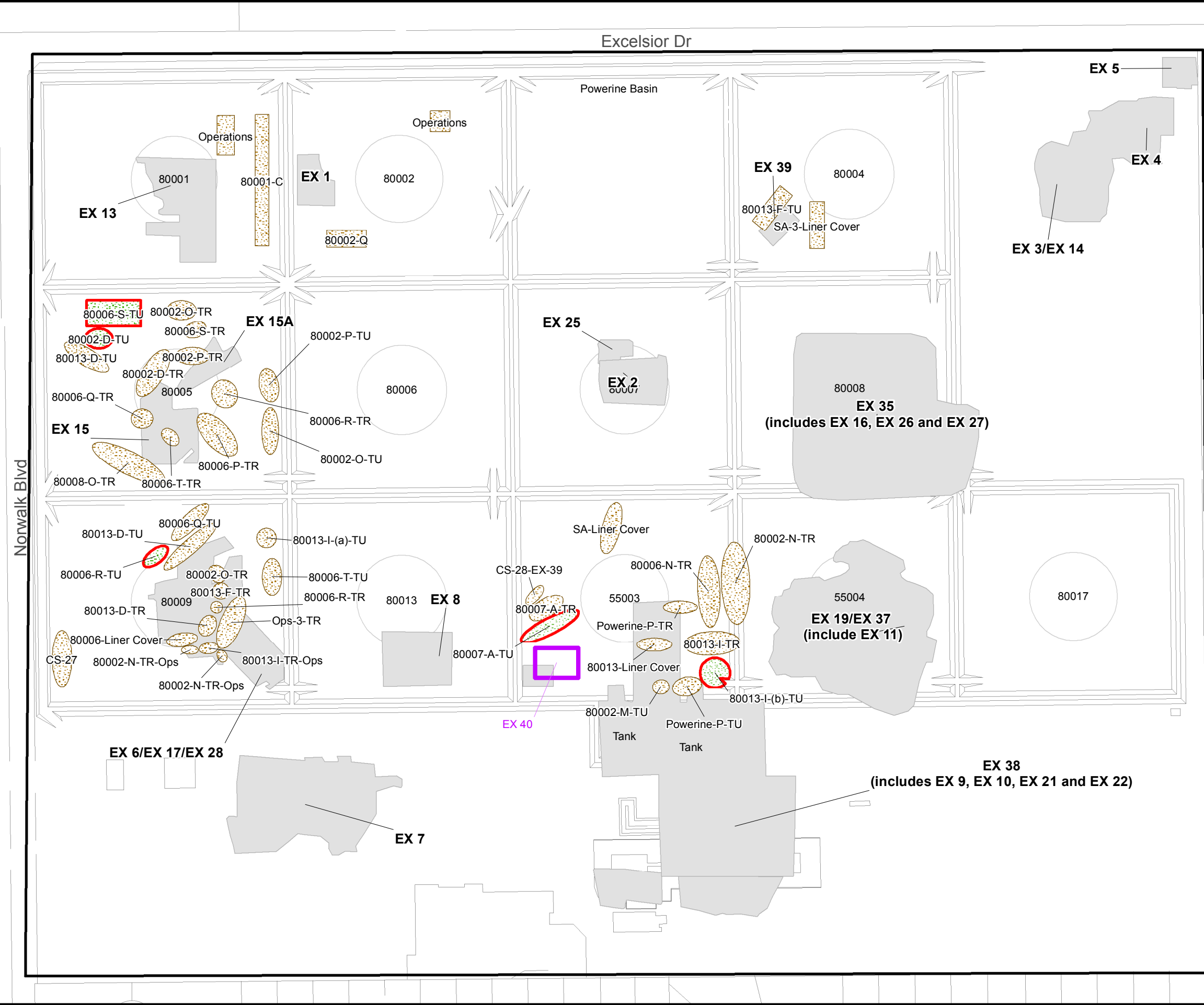
Stockpile Number	Revised Phase 11 Report Comments	Initial (Erroneous) Soil Segregation Recommendation
80002-D	24 sections selectively separated for shallow backfilling, 1 section selectively separated for off-site disposal	23 sections were selected for shallow backfill in first submittal (instead of correct 24 sections)
80002-M	33 sections selectively separated for shallow backfilling	unchanged
80002-N	15 sections selectively separated for shallow backfilling, 20 sections selectively separated for off-site disposal	unchanged
80002-O	8 sections selectively separated for shallow backfilling, 6 sections selectively separated for off-site disposal	unchanged
80002-P	5 sections selectively separated for shallow backfilling	unchanged
80006-N	34 sections selectively separated for shallow backfilling, 1 section selectively separated for off-site disposal	unchanged
80006-O	34 sections selectively separated for shallow backfilling, 1 section separated for deep soil reuse	No segregation for deep soil proposed in first submittal
80006-P	33 sections selectively separated for shallow backfilling, 2 sections selectively separated for off-site disposal	unchanged
80006-Q	13 sections selectively separated for shallow backfilling	unchanged
80006-R	16 sections selectively separated for shallow backfilling	15 sections were selected for shallow backfill in the first submittal (instead of the correct 16)
80006-S	3 sections selectively separated for shallow backfilling	2 sections were selected for shallow backfill in the first submittal (instead of the correct 3)
80006-T	1 section selectively separated for shallow backfilling	unchanged
80007-A	16 sections selectively separated for shallow backfilling, 1 section selectively separated for off-site disposal	15 sections were selected for shallow backfill in the first submittal (instead of the correct 16)
80013-D	All soil reusable at any depth	unchanged
80013-F	1 section selectively separated for shallow backfilling	unchanged
80013-I (a)	All soil reusable at any depth	unchanged
80013-I (b)	26 sections selectively separated for shallow backfilling, 2 sections selectively separated for off-site disposal	25 sections were selected for shallow backfill in the first submittal (instead of the correct 26)
Powerine-P	23 sections selectively separated for shallow backfilling, 8 sections selectively separated for off-site disposal	24 sections were selected for shallow backfill in the first submittal (instead of the correct 23)
Clean Soil		
CS-27	18 sections selectively separated for shallow backfilling	unchanged
CS-28	1 section selectively separated for shallow backfilling	unchanged

TABLE A-2
Phase 11 Treated Soil Handling Summary
DFSP Norwalk
15306 Norwalk Boulevard, Norwalk, California 90650
January 31, 2017







Stockpile Number	Stockpile Volume (yds ³)	Soil as Segregated During Stockpile Dismantling						Initial (Erroneous) Soil Segregation Recommendation
		Percent Unrestricted	Dismantled Soil Destination Stockpile ID	Percent Restricted	Dismantled Soil Destination Stockpile ID	Percent Off-Site Disposal	Dismantled Soil Destination Stockpile ID	
80002-D	1,001	29%	80002-D-TU*	68%	80002-D-TR	3%	na-retreated	23 sections were selected for shallow backfill in first submittal (instead of correct 24 sections)
80002-M	978	6%	80002-M-TU	94%	80002-M-TR	0%	na	unchanged
80002-N	1,208	0%	na	43%	80002-N-TR	57%	na-retreated	unchanged
80002-O	972	60%	80002-O-TU	23%	80002-O-TR	17%	na-retreated	unchanged
80002-P	265	72%	80002-P-TU	28%	80002-P-TR	0%	na	unchanged
80006-N	1,265	0%	na	97%	80006-N-TR	3%	na-retreated	unchanged
80006-O	845	3%	80006-O-TU	97%	80006-O-TR	0%	na	No segregation for deep soil proposed in first submittal
80006-P	1,156	0%	na	94%	80006-P-TR	6%	na-retreated	unchanged
80006-Q	1,162	63%	80006-Q-TU	37%	80006-Q-TR	0%	na	unchanged
80006-R	1,236	54%	80006-R-TU*	46%	80006-R-TR	0%	na	15 sections were selected for shallow backfill in the first submittal (instead of the correct 16)
80006-S	1,150	91%	80006-S-TU*	9%	80006-S-TR	0%	na	2 sections were selected for shallow backfill in the first submittal (instead of the correct 3)
80006-T	477	97%	80006-T-TU	3%	80006-T-TR	0%	na	unchanged
80007-A	523	32%	80007-A-TU*	64%	80007-A-TR	4%	na-retreated	15 sections were selected for shallow backfill in the first submittal (instead of the correct 16)
80013-D	794	100%	80013-D-TU	0%	na	0%	na	unchanged
80013-F	983	97%	80013-F-TU	3%	80013-F-TR	0%	na	unchanged
80013-I (a)	340	100%	80013-I (a)-TU	0%	na	0%	na	unchanged
80013-I (b)	971	20%	80013-I (b)-TU*	74%	80013-I (b)-TR	6%	na-retreated	25 sections were selected for shallow backfill in the first submittal (instead of the correct 26)
Powerine-P	1,162	11%	Powerine-P-TU	66%	Powerine-P-TR	23%	na-retreated	24 sections were selected for shallow backfill in the first submittal (instead of the correct 23)
SubTotal Volume	16,488	40.2%		51.7%		8.1%		

EXAMPLE: Treated Pile 80002 D was dismantled, and treated soil was hauled to (1) deep, unrestricted soil reuse temporary stockpile 80002 D-TU and (2) shallow restricted soil stockpile 80002-D-TR

* 5 stockpiles with potentially mis-categorized unrestricted soil from dismantled treatment pile- conservatively assigned to RESTRICTED soil reuse



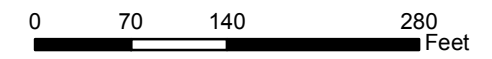
Legend

-  Former Above Ground Storage Tanks
-  DFSP Norwalk Border
-  Current Excavation
-  Backfilled Excavation
-  Remaining Stockpiles
-  Phase 11 Intermediate Stockpiles Marked Unrestricted and Proposed for Restricted Reuse



DFSP Norwalk
15306 Norwalk Boulevard
Norwalk, California

Project Number:	Date:	Drawn By:	Approved By:
04-NDLA-007	02/01/2017	PW	BM



Stockpiles Map (February 01, 2017)



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**Figure
A-1**